

WONG ♦ FLEMING

A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW

NEW YORK OFFICE

THE EMPIRE STATE BUILDING
230 FIFTH AVENUE, SUITE 5411
NEW YORK, NEW YORK 10118
TELEPHONE: (212) 643-9888
FACSIMILE: (212) 643-9840

2035 LINCOLN HIGHWAY, SUITE 1050

P.O. BOX 985

EDISON, NEW JERSEY 08818-0985

TELEPHONE: (732) 248-4111

FACSIMILE: (732) 248-8665

WEBSITE: WWW.WONGFLEMING.COM

WRITER'S E-MAIL

lwong@wongfleming.com

PENNSYLVANIA OFFICE

230 SOUTH BROAD STREET, SUITE 801
PHILADELPHIA, PENNSYLVANIA 19102
TELEPHONE: (215) 546-3778
FACSIMILE: (215) 546-3206

October 23, 2000

SENT BY HAND DELIVERY

Mr. Stephen T. Botoe
1060 Broad Street
Newark, New Jersey 07102

Frank Hutchins
Board Member
Newark Coalition for Neighborhoods
944 Broad Street, 3rd Floor
Newark, New Jersey 07102

Re: Essex Plaza Management Associates and S.H.E. Urban Renewal Association

Dear Messrs. Botoe and Hutchins:

This firm represents Essex Plaza Management Associates and S.H.E. Urban Renewal Associates, L.P. It has been brought to our attention that you have been publishing false and malicious defamatory statements concerning the operations of Essex Plaza Management Associates. These statements which are entirely baseless and appear to be intended to impugn the integrity of the operations of our clients and tortiously interfere with our clients ability to obtain legitimate tax benefits from the City of Newark, have caused our clients to incur considerable financial and other damages. You are requested to immediately cease and desist from any further tortious interference into the operations of our clients and from making any further defamatory statements related to their operations. You are also requested to publish a retraction of your slanderous remarks made about our clients to third parties.

Essex Plaza Management Associates has, for over 21 years, recognized and worked in good faith with the recognized tenants association of "Essex Plaza Swinging Seniors." This association has represented the tenants after elections which were duly held at 1060 Broad Street, Newark, New Jersey, where Mr. Botoe is also a resident. No tenants have elected or otherwise recognized any other tenants association at Broad

WONG ♦ FLEMING

Street, which is run by Essex Plaza Management Associates, or the Bruce Street Gardens, which is run by S.H.E. Urban Renewal Associates, L.P.

Mr. Botoe as a resident of 1060 Broad Street is well aware that the tenants have not recognized any other tenants organization except for the Essex Plaza Swinging Seniors. He has nevertheless falsely represented that another organization identified as the Essex Plaza One Tenants Association has been denied the opportunity to use meeting rooms at Broad Street. This is false. Rather, Mr. Botoe was advised that he was required to contact the recognized tenants association to coordinate the use of a certain meeting room. He and his purported organization were never denied the use of any room.

Most troubling is that you have interfered with the operations of S.H.E. Urban Renewal Associates, L.P., by publishing false and defamatory statements to the Newark City Council, based not on the operations of S.H.E., but on alleged activities occurring at a totally different building with totally different management. You should know that Essex Plaza Management Associates does not run S.H.E. Urban Renewal Associates, and what is occurring at 1060 Broad Street, has nothing to do with the operations at Bruce Street Gardens.

Contrary to your defamatory publications, there has been no attempt to prevent you from meeting at 1060 Broad Street, there has been no violation of any HUD regulation and there is no "bitter battle" with Ken Pagano, the President of Essex Plaza Management Associates over your alleged right to organize. We consider your remarks that Mr. Pagano has in some way engaged in harassment of you as a further attempt to tortiously interfere with the operations of our clients, and a direct slanderous attack on Mr. Pagano.

Again, we request that you immediately cease and desist from publishing defamatory remarks concerning our clients and publish a retraction of them. If this is not forthcoming we will consider more formal means of redress.

Very truly yours,

Linda Wong

File no. 09190016
LW/lw